

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

BLAKE LIVELY,

Plaintiff,

v.

WAYFARER STUDIOS LLC, et al.,

Defendants.

JENNIFER ABEL,

Third-Party Plaintiff,

v.

JONESWORKS LLC,

Third-Party Defendant.

WAYFARER STUDIOS LLC, et al.,

Consolidated Plaintiffs,

v.

BLAKE LIVELY, et al.

Consolidated Defendants.

**DECLARATION OF STEPHANIE A. ROESER
IN SUPPORT OF BLAKE LIVELY'S MOTION TO COMPEL**

I, Stephanie A. Roeser, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I am an attorney admitted to practice before this Court, a partner in the law firm of Manatt, Phelps & Phillips LLP, 2049 Century Park East, Los Angeles, CA 90067, and counsel of record for Blake Lively in the above-captioned action. I respectfully submit this declaration in

support of Ms. Lively's letter motion to compel Defendant The Agency Group PR LLC ("TAG") to de-designate as confidential and Attorneys' Eyes Only ("AEO") TAG's June 25, 2025 Second Supplemental Responses and Objections to Ms. Lively's First Set of Interrogatories (the "Interrogatories," and TAG's responses, the "Interrogatory Responses").

2. On March 14, 2025, Ms. Lively propounded the Interrogatories on TAG.

3. On June 25, 2025, TAG served the Interrogatory Responses after being ordered by the Court to do so, *see* Dkt. No. 355. TAG designated the entirety of the Interrogatory Responses as confidential and AEO. A true and correct copy of the Interrogatory Responses are attached hereto as Exhibit 1.¹

4. I participated in a telephonic meet-and-confer with TAG's counsel on or about July 2, 2025. During that conferral, we inquired about the basis for the confidential and AEO designation of the Interrogatory Responses. TAG's counsel represented that the Interrogatory Responses had been marked confidential and AEO pursuant to Paragraph 2 of the Protective Order, dated March 13, 2025, *see* Dkt. No. 125, as including trade secrets or competitive information, which if disclosed, could allegedly harm TAG's business.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Dated: July 18, 2025

/s/ Stephanie A. Roeser
Stephanie A. Roeser (admitted *pro hac vice*)

¹ Filed contemporaneously herewith is a letter motion to seal Exhibit 1.